

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

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**PROJECT VOTE, INC.,**

Plaintiff,

v.

**BRIAN KEMP,**

*In His Official Capacity as Georgia  
Secretary of State and Chief Election  
Official for the State of Georgia,*

Defendant.

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CIVIL ACTION NO.

**DECLARATION OF  
JONATHAN R. FERENCÉ-  
BURKE IN SUPPORT OF  
COMPLAINT FOR  
DECLARATORY AND  
INJUNCTIVE RELIEF**

I, Jonathan R. Ference-Burke, hereby declare:

1. I am an associate at the law firm of Ropes & Gray LLP and counsel for Plaintiff Project Vote, Inc. (“Project Vote” or “Plaintiff”). I have personal knowledge of the facts below.
2. I make this Declaration in support of Plaintiff’s Complaint for Declaratory and Injunctive Relief.
3. Attached hereto as Exhibit A is a true and correct copy of a document produced by Georgia Secretary of State Brian Kemp (“Defendant”) to Project Vote on or about August 25, 2016. The document is titled “Submission Under Section 5

of the Voting Rights Act,” dated August 17, 2010.

4. Attached hereto as Exhibit B is a true and correct copy of a letter from Brian Mellor, General Counsel, Project Vote, to Defendant, dated May 13, 2014.

5. Attached hereto as Exhibit C is a true and correct copy of a letter from C. Ryan Germany, General Counsel, Office of the Georgia Secretary of State, to Mellor, dated July 11, 2014.

6. Attached hereto as Exhibit D is a true and correct copy of a letter from Michelle Kanter Cohen, Counsel, Project Vote, to Germany, dated September 18, 2014.

7. Attached hereto as Exhibit E is a true and correct copy of a letter from Mellor to Defendant, dated September 24, 2014.

8. Attached hereto as Exhibit F is a true and correct copy of an email from Mellor to Germany, dated September 25, 2014.

9. Attached hereto as Exhibit G are true and correct copies of emails between Mellor and Germany, dated September 29, 2014.

10. Attached hereto as Exhibit H are true and correct copies of emails between Mellor and Germany, dated October 9, 2014.

11. Attached hereto as Exhibit I are true and correct copies of emails between Mellor and Germany, dated October 14, 2014.

12. Attached hereto as Exhibit J are true and correct copies of emails between Mellor and Germany, dated October 15, 2014 to October 17, 2014.

13. Attached hereto as Exhibit K are true and correct copies of emails between Ryan Malone, Counsel, Ropes & Gray LLP, and Germany, dated October 30, 2014 to April 3, 2015.

14. Attached hereto as Exhibit L is a true and correct copy of a letter from Jonathan R. Ference-Burke, Ropes & Gray LLP, to Defendant, dated July 6, 2015.

15. Attached hereto as Exhibit M is a true and correct copy of a letter from Germany to Ference-Burke, dated August 25, 2015.

16. Attached hereto as Exhibit N are true and correct copies of emails between Ference-Burke and Germany, dated September 30, 2015 to December 17, 2015.

17. Attached hereto as Exhibit O are true and correct copies of emails between Ference-Burke, Nicole Durkin, Ropes & Gray LLP, and Germany, dated December 18, 2015 to May 5, 2016.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED at Washington, D.C., this 6th day of July, 2016.

By: /s/ Jonathan R. Ference-Burke  
Jonathan R. Ference-Burke